

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH S. BEALE,

PLAINTIFF

v.

REVOLUTION PORTFOLIO, LLC; and
SECURITY LIFE OF DENVER
INSURANCE COMPANY,

DEFENDANTS.

CASE NO. 07-06909

Judge Kocoras
Magistrate Judge Valdez

MOTION FOR EXTENSION OF TIME TO RESPOND TO VARIOUS MOTIONS

Defendant REVOLUTION Portfolio, LLC, by and through its attorneys, Connolly Roberts & McGivney, LLC, for its Motion for Extension of Time to Respond to Various Motions, states:

1. April 21, 2008, Plaintiff Joseph Beale (“Beale”) filed five separate discovery related motions: 1) a Motion for Entry of a Protective Order, 2) a Motion to Strike Evasive Answers to Requests to Admit and Deem Requests Admitted, 3) a Motion to Compel, 4) a Motion to Quash Subpoenas, and 5) a Motion for Extension of Time to Complete Discovery.
2. These motions are noticed to be heard on May 6, 2008.
3. REVOLUTION intends to file responses to these motions. Unfortunately, REVOLUTION’s counsel, Matthew P. Connolly and Garrett C. Carter, are preparing for a trial in the DuPage County Circuit Court captioned *Comdata Network Inc. v. Unilever Bestfoods*, Case No. 04L738 which is also scheduled to commence on May 6, 2008 and is expected to last three days. REVOLUTION will therefore be unable to respond to the Motions prior to the May 6th hearing.

4. As such, REVOLUTION requests an extension of time up until May 13, 2008, to reply to Plaintiff's various motions. REVOLUTION does not make this motion for purposes of delay.

WHEREFORE, REVOLUTION Portfolio, LLC respectfully requests this court enter an order granting REVOLUTION an extension until May 13, 2008, to reply to Plaintiff's motions.

Dated: May 1, 2008

Respectfully Submitted,

REVOLUTION PORTFOLIO, LLC

By: /s/ Matthew P. Connelly
One of its attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certify that on May 1, 2008, a true copy of the attached document was served upon the attorneys of record for each other party via the ECF Filing System.

By: /s/ Matthew P. Connelly